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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
303 Methodist Building
11th & Chapline Streets
Wheeling, WV 26003

NOV 10 1994

VIA FACSIMILE AND FEDERAL EXPRESS OVERNIGHT DELIVERY

Mr. Scott Slagley
RF & P Corporation
Main Street Centre, 23rd Floor
600 East Main Street
Richmond, Virginia 23219

Re: Potomac Yard Site
City of Alexandria and Arlington County, Virginia

Dear Mr. Slagley:

This purpose of this letter is to document EPA's response to several issues raised by Respondent and Respondent's contractor, ETI during a telephone conversations since November 1, 1994, facsimile dated November 7, 1994 from Mr. Chuck Flippo of ETI to Jeffrey Dodd, EPA Region III and letter dated November 9, 1994 from Channing Martin of Williams, Mullen, Christian & Dobbins to Karen Melvin, U.S. EPA Region III. The issues relate to additional sampling at the Site and modifications to the Work Plan Addendum as specified in EPA's letter to Respondent dated October 25, 1994. EPA's response to each of the issues are specified below.

1. North Tail Biased Sample Locations

   As specified in EPA's letter to Respondent dated October 25, 1994, soil sample BN28.25C.5-1 and BN28.25C.5-2 must be collected and analyzed for TCL Organics (except VOCs) and TAL Metals. The collection of soil samples BN21.5A.75-1 and BN21.5A.75-2 may be omitted at this time.

2. Monitoring Wells MW-72/MW-73 - Analytical Parameters

   Since the purpose of these wells is to define the extent of kerosene contamination detected in MW-27, ground water samples from these 2 wells need not be collected and analyzed for TCL Organics and TAL Metals at this time. However, if any petroleum product is encountered in either or both of these wells, samples must be collected to determine the nature of the contamination.

3. Deep Ground Water Sample - Analytical Parameters

As specified in EPA's letter dated October 25, 1994, ground water collected from the lower aquifer must be analyzed for the full list of TCL Organics and TAL Metals (total and filtered).

4. North Tail Ground Water Sampling

Since a ground water sample collected from monitoring well HS-8 (MW-43) was analyzed for TCL Organics and TAL Metals in 1992 under the original extent of contamination study (ECS) work plan, a ground water sample need not be collected for analysis as specified in EPA's October 25, 1994 letter. However, a ground water sample from monitoring well HS-5 must be collected and analyzed for TCL Organics (except VOCs and PAHs).

5. Ground Water Filtering Procedures

As previously specified by EPA, all ground water and surface water samples collected for the determination of dissolved metals must be filtered immediately after sample collection and prior to preservation in accordance with EPA Region III guidance. Therefore, it will be necessary to filter and preserve the samples in the field prior to shipment to the laboratory.

6. Deep Ground Water Monitoring Well Installation

As specified in EPA's letter dated October 25, 1994, the deep ground water sample must be collected after the installation of a monitoring well located downgradient of MW-27, i.e., collection of ground water from the lower aquifer using direct push technology (DPT) is unacceptable. However, DPT may used in the collection of a ground water screening sample above the aquitard collected to determine if elevated concentrations of contamination may be present prior to installation of the monitoring well into the lower aquifer. Respondent has proposed to place the lower aquifer monitoring well downgradient of MW-27 on the Potomac River side of the "hump", approximately 200 feet downgradient of MW-27. The proposed location of the lower aquifer monitoring well is acceptable to EPA as long as there is no ground water divide between MW-27 and the proposed location of the lower aquifer monitoring well. The lower aquifer monitoring well

must be placed in the same ground water regime downgradient of MW-27.

7. Elevated Levels of Contamination

Respondent has requested EPA to define the term "elevated levels of contamination" which would cause termination of the drilling of the lower aquifer monitoring well. EPA cannot provide a specific number with respect to analyte concentrations which EPA considers to be elevated. However, in general, concentration(s) of contaminants in the part per million (ppm) range may indicate "elevated levels of contamination", whereas contaminants found in the low part per billion (ppb) range may not be considered elevated. The ground water screening sample data collected above the aquitard must be submitted to the EPA Project Coordinator prior to completion or abandonment of the well. Determination of elevated levels of contamination above the aquitard and hence determination of the decision to proceed with installation of the lower aquifer monitoring well or to relocate the lower aquifer monitoring well to a different position must be coordinated with the EPA Project Coordinator and/or his authorized designated representative.

8. Map Plate 8 / MW-6

EPA concurs with Respondent's observation that MW-6 is located within the Potomac Greens area of the site, and therefore, the location of MW-6 should not be depicted on Map Plate 8 which details existing and proposed ground water sampling locations in Area A-1.

9. Risk Based Concentration for Xylene

EPA concurs with respondents observation that the residential soil risk based concentration (RBC) for xylene(s)-total is 160,000 mg/Kg, and not 16,000 mg/Kg as previously stated in EPA's letter dated October 25, 1994. Therefore, no change in Table 5 and J-1 of the Work plan Addendum is required. EPA's comment concerning the xylene RBC in the October 25, 1994 letter was based on an earlier version of the RBC table which listed the xylene soil RBC as 16,000 mg/Kg.

10. Proposed Monitoring Wells Near MW-27

EPA has no objection to the numbering of the proposed two (2) new monitoring wells near MW-27 as MW-68 and MW-69 to stay consistent with the current numbering of ground water sampling points.

11. Ecological Risk Assessment - Verification Sampling

Respondent requested clarification regarding verification sampling of the Potomac River, Four Mile Run and other habitats, e.g., Potomac Greens that may receive or have received contamination from the Site. EPA may require verification sampling of the Potomac River, Four Mile Run, and other habitats, e.g., Potomac Greens, that may receive or have received contamination from the site in the past at the conclusion of the risk assessment or after implementation of any source control measures as a result of an EE/CA, if one is warranted. The fifth sentence of Comment K located on page 10 of EPA's October 25, 1994 letter is modified to reflect that EPA may require verification sampling as described above.

If you have any questions regarding this letter, please contact me at (304) 234-0254.

Sincerely,

Jeffrey A Dodd

Jeffrey A. Dodd, OSC/EPA Project Coordinator
U.S. EPA Region III Removal Enforcement Section

cc: Karen Melvin, U.S. EPA Region III, Rem. Enf. Sect. (3HW33)
Gene Wingert, U. S. EPA, VA/WV Rem. Sect (3HW41)
William Skrabak, Alexandria Health Department
Joan Becker, Arlington County Health Department
Tom Modena, VDEQ-Richmond
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